

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

OMER BEDIR KORKMAZ,

Defendant.

INFORMATION

24 Cr. 165 (PMH)

COUNT ONE
(Conspiracy to Steal Government Property)

The United States Attorney charges:

1. From at least in or about December 2019 through at least in or about June 2022, in the Southern District of New York and elsewhere, OMER BEDIR KORKMAZ, the defendant, and others known and unknown, willfully and knowingly combined, conspired, confederated, and agreed together and with each other to commit an offense against the United States, to wit, theft of Government property, in violation of Title 18, United States Code, Section 641.

2. It was a part and object of the conspiracy that OMER BEDIR KORKMAZ, the defendant, and others known and unknown, would and did intentionally and knowingly embezzle, steal, purloin, and convert to his use and the use of another, a record, voucher, money, and thing of value of the United States and a department and agency thereof, and property made and being made under contract for the United States and a department and agency thereof, to wit, the United States Postal Service, which exceeded the sum of \$1,000, and received, concealed, and retained the same with intent to convert it to his use and gain, knowing it to have been embezzled, stolen, purloined, and converted, to wit, KORKMAZ obtained and used forged or counterfeited postage

stamps, which defrauded the United States Postal Service of approximately \$580,151 in revenue, in violation of Title 18, United States Code, Section 641.

Overt Acts

3. In furtherance of the conspiracy and to effect the illegal object thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

a. On or about December 13, 2021, OMER BEDIR KORKMAZ, the defendant, mailed a package using a forged or counterfeited postage stamp in New York, New York.

b. On or about January 14, 2022, OMER BEDIR KORKMAZ, the defendant, mailed a package using a forged or counterfeited postage stamp in Mount Vernon, New York.

(Title 18, United States Code, Section 371.)

FORFEITURE ALLEGATION

4. As a result of committing the offense alleged in Count One of this Information, OMER BEDIR KORKMAZ, the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28 United States Code, Section 2461(c), any and all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of said offense, including but not limited to \$580,151 in United States currency representing the amount of proceeds traceable to the commission of said offense.

Substitute Assets Provision

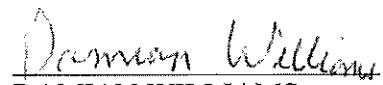
5. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;

- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Section 981; Title 21, United States Code, Section 853; and Title 28, United States Code, Section 2461.)


Damian Williams
DAMIAN WILLIAMS
United States Attorney